

EXHIBIT

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-5944 SC

MDL No. 1917

**RESPONSES AND OBJECTIONS
OF ABSENT CLASS MEMBER
DOUGLAS W. ST. JOHN TO
THE AMENDED SUBPOENA
DUCES TECUM ISSUED BY
ROBERT J. GRALEWSKI, JR.**

This Document Relates To:
All Indirect Purchaser Actions

Pursuant to the Federal Rules of Civil Procedure, absent class member Douglas W. St. John (“Mr. St. John”), by the undersigned attorneys, hereby provides his responses and objections to the Subpoena to Testify at a Deposition in a Civil Action (“the Subpoena”) issued by IPP Counsel Robert J. Grawalski, Jr., and dated October 13, 2015, as amended on or about October 21, 2015.

GENERAL OBJECTIONS

1. Mr. St. John objects to the subpoena as untailored, over broad, unduly burdensome, harassing, oppressive, abusive, and needlessly increasing the cost of the litigation—particularly given his status as an absent class member—for at least the following reasons:

a. IPP Counsel refused to provide any rationale for seeking discovery—let alone Mr. St. John’s deposition—beyond an unsupported claim that they are “entitled” to do so. *See* J.S. St. John Letter to Grawalski (Oct. 13, 2015). But “the party seeking the depositions [of absent class members] has the burden of showing necessity and absence of any motive to take undue advantage of the class members.” *Clark v. Universal Builders, Inc.*, 501 F. 2d 324, 341 (7th Cir. 1974); *see also, e.g., Corpac v. Rubin & Rothman, LLC*, No. 10-cv-4165, 2012 WL 2923514, at *2-3 (E.D.N.Y. July 18, 2012) (declining to permit deposition of objector absent “strong showing” of need); William B. Rubenstein, *Newberg on Class Actions* § 13:33 (5th ed. 2014) (“[D]iscovery from objectors should not be automatic lest it dissuade class members from exercising their right to object,” and a court should compel such discovery only “after some preliminary showing by class counsel of collusion or malfeasance by the objector.”).

b. Mr. St. John made a prima facie showing of his standing to object. *See* Declaration of Douglas W. St. John (D.E. 4107). And IPP Counsel conceded that the standing inquiry under the settlements is minimal: consumers “don’t have to disassemble their TVs,” and they “don’t even still need to have their TVs.” *See* J.S. St. John Letter to Grawalski (October 13, 2015).

c. Mr. St. John provided a sworn declaration that he submitted his objection “in good faith” and that he has “never before submitted an objection.” Declaration of Douglas W. St. John (D.E. 4107) at ¶ 26. The Subpoena nevertheless seeks documents regarding other objections filed by Mr. St. John or his attorneys. **Mr. St. John is willing to meet-and-confer regarding an**

1 appropriately tailored supplemental declaration to resolve any remaining questions IPP
2 Counsel may have.

3 d. Essentially identical document requests were stricken as overbroad or were
4 significantly limited by Special Master Quinn in the *TFT-LCD* litigation. Special Master's Amended
5 Order (D.E. 7011), *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL 07-1827 (N.D. Cal. Oct. 19,
6 2012), *objections denied* (D.E. 7152) (N.D. Cal. Nov. 14, 2012). Both the attorney who issued the
7 subpoena to Mr. St. John and that attorney's law firm appeared in the *TFT-LCD* litigation, and they
8 presumably were served with and are aware of the Special Master's Amended Order in the that
9 litigation.

10 e. Mr. St. John expressly reserves the right to seek sanctions and an order requiring
11 payment of his costs, expenses, attorney fees, and professional time, particularly if IPP Counsel
12 insists upon a deposition.

13 2. Mr. St. John objects to the subpoena as being served for an improper purpose for at
14 least the following reasons:

15 a. IPP Counsel have served essentially identical, untailored subpoenas on at least 16
16 objectors.

17 b. The subpoenas directed to each of the objectors—and the topics of deposition
18 sought by IPP counsel—are largely directed to the motivation of the objectors and their counsel for
19 objecting, a subject that is not relevant to the parties' or IPP Counsels claims and defenses. Further,
20 "[t]his raises a concern that the proposed discovery is being sought to gain a tactical advantage not
21 only in this litigation, but in all . . . class actions involving counsel for the parties." *Corpac v. Rubin &*
22 *Rothman, LLC*, No. 10-cv-4165, 2012 WL 2923514, at *3 (E.D.N.Y. July 18, 2012). That purpose is
23 improper. *See id.* (quashing subpoena).

24 c. The most reasonable inference is that these subpoenas were issued for the purpose
25 of annoying and harassing class members, including Mr. St. John, who have the temerity to file
26 objections. *Cf. Mattel, Inc. v. Walking Mountain Productions, Inc.*, 353 F.3d 792, 813-14 (9th Cir. 2003)
27 (district court did not abuse its discretion by quashing subpoena and awarding attorney fees after
28 finding subpoena was "served for the purpose of annoying and harassment and not really for the

purpose of getting information”). Consistent with that inference, IPP Lead Counsel Mario Alioto explained that the subpoenas directed to objectors are intended “to weed out guys that are off the wall” and that “a couple of objections” have “dropped out” as a result of the subpoenas. *See* J.S. St. John Letter to Alioto (Oct. 26, 2015).

d. Mr. St. John expressly reserves the right to seek sanctions and an order requiring payment of his costs, expenses, attorney fees, and professional time, particularly if IPP Counsel insist upon a deposition.

3. Mr. St. John objects to the Subpoena as a breach of IPP Counsel’s obligations to Mr. St. John as a class member.

4. To the extent the subpoena was issued by IPP Counsel acting in their own interest, Mr. St. John objects to the Subpoena as improper and abusive because it was not issued by a party or an attorney acting on behalf of a party.

5. Fact discovery in this matter closed on September 5, 2014. Stipulation and Order Regarding Scheduling (D.E. 2459); *see also* Alioto Dec. (D.E. 4071-1) at ¶ 54. A Federal Rule of Civil Procedure 45 subpoena constitutes discovery, and neither the Court nor the Special Master issued an order authorizing additional discovery. Mr. St. John therefore objects to the Subpoena as improper, abusive, and unenforceable. *See, e.g.*, Fed. R. Civ. P. 16(b)(4); N.D. Cal. Civ. L.R. 37-3.

6. Mr. St. John objects to the Subpoena, and each request, definition, and instruction therein to the extent that it is inconsistent with or attempts to impose burdens or obligations on Mr. St. John beyond those imposed by the Federal Rules of Civil Procedure and applicable law. Mr. St. John will comply with the Federal Rules of Civil Procedure, but assumes no further obligations in responding to the Subpoena.

7. Mr. St. John objects to the Subpoena and each request, definition, and instruction therein to the extent that it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, or any other applicable privilege or protection (“privileged information”). The inadvertent disclosure of privileged information in response to the Subpoena shall not be deemed a waiver of any privilege as to any privileged information inadvertently

1 disclosed or any other information or documents relating to the subject matter of any inadvertently
2 disclosed privileged information.

3 8. Mr. St. John objects to the Subpoena as over broad, unduly burdensome, abusive,
4 oppressive, harassing, and violating the work product doctrine to the extent it seeks discovery from
5 his attorney in this matter without a showing that no other means exist to obtain the information,
6 the information sought is relevant and non-privileged, and the information is crucial to the
7 preparation of the case.

8 9. Mr. St. John objects to the Subpoena and each request, definition, instruction
9 therein as unduly burdensome and oppressive to the extent that it seeks information that: (a) is
10 already in IPP Counsel's possession, custody, or control; (b) does not exist or is not in Mr. St.
11 John's possession, custody, or control; (c) is equally or more readily available from sources other
12 than Mr. St. John; or (d) IPP Counsel can obtain from other sources that are more convenient, less
13 burdensome, and/or less expensive than requiring absent class member Mr. St. John to provide the
14 information. For the avoidance of doubt, at least pleadings and ECF notifications fall within the
15 scope of this objection, and Mr. St. John will neither search for nor log such documents.

16 10. Mr. St. John objects to the Subpoena and each request, definition, and instruction
17 therein to the extent that it seeks information that is not relevant to any claim or defense asserted
18 by a party in this action or otherwise beyond the scope of permissible discovery in this action.

19 11. Mr. St. John objects to the Subpoena and each request, definition, and instruction
20 therein to the extent that it does not specify a time period or seeks to impose an unreasonable time
21 period.

22 12. Mr. St. John's responses to these requests shall not be construed in any way as an
23 admission that any definition provided by IPP Counsel is either factually correct or legally binding
24 upon Mr. St. John.

25 13. Mr. St. John objects to each request, definition, and instruction to the extent that
26 they contain numerous subparts, are compound, and/or pose multiple requests, and thereby render
27 the set of requests confusing or unduly burdensome.

28

1 14. Mr. St. John objects to the Subpoena and each request, definition, and instruction
2 therein as over broad, unduly burdensome, harassing, and oppressive to the extent that it requests
3 information relating to activities beyond the scope of this action.

4 15. Mr. St. John objects to the Subpoena and each request, definition, and instruction
5 therein to the extent it use words and phrases that are vague, ambiguous, not defined in an
6 understandable manner, requires subjective knowledge, or involves issues of law subject to
7 resolution by the court. To the extent feasible, Mr. St. John will interpret the terms and phrases
8 used in the Subpoena as those terms and phrases are understood by him.

9 16. Mr. St. John objects to the Subpoena and each request, definition, and instruction
10 therein as overly broad, unduly burdensome, and oppressive to the extent it seeks information
11 regarding data found on backup media, voicemails, PDAs, or mobile phones. Pursuant to Fed. R.
12 Civ. P. 45(e)(1), data found on backup media, voicemails, PDAs, or mobile phones will not be
13 searched in response to the Subpoena. Mr. St. John identifies these sources of ESI as not
14 reasonably accessible because of undue burden and cost particularly given Mr. St. John's status as
15 an absent class member.

16 17. Mr. St. John objects to the Subpoena and each request, definition, and instruction
17 therein as overly broad, unduly burdensome, oppressive, and outside the scope of discovery to the
18 extent it seeks information regarding metadata. Mr. St. John identifies metadata as not reasonably
19 accessible because of undue burden and cost, particularly given Mr. St. John's status as an absent
20 class member.

21 18. Mr. St. John objects to serving a privilege log contemporaneous with his document
22 production. Mr. St. John reserves the right to serve a privilege log within a reasonable time
23 thereafter.

24 19. Mr. St. John objects to the manner of recording the deposition and reserves the
25 right to record the deposition by audio and/or audiovisual means.

26 20. Mr. St. John objects to the time and date of deposition as stated in the original
27 Subpoena. Pursuant to Mr. St. John's agreement with IPP Counsel, Mr. St. John will appear at the
28 Wingate Beach Hotel, 4302 W. Beach Blvd., Gulfport, Mississippi, on November 2, 2015, at 10

1 a.m., and IPP Counsel's examination of Mr. St. John shall be limited to two hours. *See* Grewalski
 2 Email to J.S. St. John (October 14, 2015). Further, by agreement of IPP Counsel, IPP Counsel's
 3 questioning "will be limited to [Mr. St. John's] standing, factual support for his objection, any prior
 4 objections, and if so, the circumstances of such objections including any compensation received."
 5 *Id.*

6 **OBJECTIONS TO DEFINITIONS**

7 1. Mr. St. John objects to the definition of "YOU," "YOUR," or "YOURS" to the
 8 extent they purport to encompass anyone other than Mr. St. John. In particular, Mr. St. John
 9 objects to this definition to the extent it purports to impose upon Mr. St. John an obligation to
 10 produce documents in the possession, custody, or control of his attorneys other than documents
 11 delivered to his attorneys by Mr. St. John. Accordingly, Mr. St. John will only produce documents in
 12 his own possession, custody, or control and that are located after a reasonable search.

13 2. Mr. St. John objects to the definition of "RELATING TO" and "IN RELATION
 14 TO" as over broad and vague. Mr. St. John understands these terms as limited to a reasonable
 15 relationship.

16 **OBJECTIONS TO INSTRUCTIONS**

17 1. Mr. St. John objects to Instruction No. 1 as over broad, unduly burdensome,
 18 abusive, and inconsistent with the Federal Rules of Civil Procedure and other applicable law. Mr. St.
 19 John will only produce documents that are in his own possession, custody, or control and located
 20 after a reasonable search.

21 2. Mr. St. John objects to Instruction No. 3 as overly broad, unduly burdensome,
 22 abusive, and inconsistent with the Federal Rules of Civil Procedure and other applicable law,
 23 particularly when read in conjunction with other instructions, definitions, and requests.

24 a. Mr. St. John objects to any requirement that his privilege log do more than
 25 "describe the nature of the withheld documents, communications, or tangible things in a manner
 26 that, without revealing information itself privileged or protected, will enable the parties to assess the
 27 claim." Fed. R. Civ. P. 45(e)(2).
 28

b. Mr. St. John will not provide a log of withheld documents that are work product and which have never left the possession, custody, or control of his attorneys, nor will he provide a log of withheld communications that are solely between his attorneys in this matter. Mr. St. John identifies those categories of documents as properly withheld under (a) the attorney work product doctrine as reflecting attorney mental impressions and litigation strategy, and/or the (b) attorney-client communications privilege based on references to attorney-client communications.

c. Mr. St. John will otherwise provide a privilege log for withheld responsive documents that are in his own possession, custody, or control and located after reasonable search.

RESPONSES AND OBJECTIONS TO SPECIFIC REQUESTS

Request No. 1

All DOCUMENTS supporting YOUR OBJECTION filed in the CRT ANTITRUST LITIGATION, including those supporting YOUR assertion that YOU are a member of the Settlement Class in the CRT ANTITRUST LITIGATION.

Response and Specific Objections to Request No. 1

Mr. St. John objects to the request for “all” documents as over broad and unduly burdensome, particularly given Mr. St. John’s status as an absent class member. Mr. St. John objects to the word “supporting” as vague, ambiguous, inherently subjective, and requiring legal analysis. Mr. St. John objects to this request to the extent it seeks privileged information. Subject to and without waiving his general and specific objections, Mr. St. John will produce non-privileged documents responsive to this request that are located after a reasonable search. Mr. St. John incorporates by reference the pleadings and other materials on file in this litigation, together with the correspondence between his counsel and IPP Counsel. Mr. St. John reserves the right to rely on additional documents to address arguments raised by IPP Counsel in response to his objection.

Request No. 2

All DOCUMENTS RELATING TO any COMMUNICATION between YOU and any PERSON (including but not limited to Christopher Bandas, Timothy R. Hanigan, Jan I. Westfall, Francis O. Scarpulla, Josef D. Cooper, Robert J. Bonsignore, Paul B. Justi, Theresa D. Moore, Steve Miller, Jonathan E. Fortman, John C. Kress, Joseph Darrell Palmer, any member of the Competitive Enterprise Institute Center for Class Action Fairness, or any other attorney) RELATING to the CRT ANTITRUST LITIGATION.

Response and Specific Objections to Request No. 2

Mr. St. John objects to the request for “all” documents as over broad and unduly burdensome, particularly given Mr. St. John’s status as an absent class member. Mr. St. John objects to the word “member” as vague and ambiguous. Mr. St. John objects to this request to the extent it requires him to ascertain the “member[s]” of an entity with which he has no relationship. Mr. St. John objects to this request to the extent it seeks privileged information. Mr. St. John objects to this request as seeking information that is not relevant and is beyond the scope of permissible discovery. Mr. St. John notes that Special Master Quinn struck as overbroad a substantially identical request in the *TFT-LCD* litigation. *See* Special Master’s Amended Order (D.E. 7011), *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL 07-1827 (N.D. Cal. Oct. 19, 2012), *objections denied* (D.E. 7152) (N.D. Cal. Nov. 14, 2012).

Subject to and without waiving his general and specific objections, Mr. St. John will produce non-privileged documents responsive to this request that are located after a reasonable search.

Request No. 3

ALL DOCUMENTS RELATING TO the REPRESENTATION of YOU by any PERSON (including but not limited to any retainer agreement and/or other related documents) IN RELATION TO the CRT ANTITRUST LITIGATION.

Response and Specific Objections to Request No. 3

Mr. St. John objects to the request for “all” documents as over broad and unduly burdensome, particularly given Mr. St. John’s status as an absent class member. Mr. St. John objects to this request as seeking information that is not relevant and is outside the scope of permissible discovery. Mr. St. John objects to this request to the extent it seeks privileged information. Mr. St. John notes that Special Master Quinn limited a substantially identical request in the *TFT-LCD* litigation to “documents concerning the existence of an attorney-client relationship and fee arrangements.” Special Master’s Amended Order (D.E. 7011), *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL 07-1827 (N.D. Cal. Oct. 19, 2012), *objections denied* (D.E. 7152) (N.D. Cal. Nov. 14, 2012).

Consistent with Special Master Quinn’s order in the *TFT-LCD* litigation and subject to and without waiving his general and specific objections, Mr. St. John will produce non-privileged

documents “concerning the existence of an attorney-client relationship and fee arrangements” in relation to the CRT Antitrust Litigation that are located after a reasonable search.

Request No. 4

All DOCUMENTS RELATING to any agreements between YOU and any other PERSON (including but not limited to Christopher Bandas, Timothy R. Hanigan, Jan L. Westfall, Francis O. Scarpulla, Josef D. Cooper, Robert J. Bonsignore, Paul B. Justi, Theresa D. Moore, Steve Miller, Jonathan E. Fortman, John C. Kress, Joseph Darrell Palmer, any member of the Competitive Enterprise Institute Center for Class Action Fairness, or any other attorney) IN RELATION TO the CRT ANTITRUST LITIGATION.

Response and Specific Objections to Request No. 4

Mr. St. John objects to the request for “all” documents as over broad and unduly burdensome, particularly given Mr. St. John’s status as an absent class member. Mr. St. John objects to this request as seeking information that is not relevant and is outside the scope of permissible discovery. Mr. St. John objects to this request to the extent it seeks privileged information. Subject to and without waiving his general and specific objections, Mr. St. John will produce non-privileged documents responsive to this request that are located after a reasonable search.

Request No. 5

All DOCUMENTS RELATING TO any OBJECTION filed in any court or proceeding in the last (5) years by YOU and/or YOUR attorney currently REPRESENTING YOU in the CRT ANTITRUST LITIGATION.

Response and Specific Objections to Request No. 5

Mr. St. John objects to the request for “all” documents as over broad and unduly burdensome, particularly given Mr. St. John’s status as an absent class member. Mr. St. John objects to this request as seeking information that is not relevant and is outside the scope of permissible discovery. Mr. St. John objects to this request to the extent it seeks privileged information. Mr. St. John objects to this request as facially seeking documents that are not in his possession, custody, or control. Mr. St. John objects to this request as untailored, over broad, unduly burdensome, harassing, oppressive, and abusive in view of his sworn declaration that he has “never before submitted an objection.” Declaration of Douglas W. St. John (D.E. 4107) at ¶ 26.

Mr. St. John notes that Special Master Quinn limited a substantially identical request to “documents pertaining to objections filed in other cases by the Objector, not documents pertaining

to objections filed in other cases by counsel for the Objector” in the *TFT-LCD* litigation. *See* Special Master’s Amended Order (D.E. 7011), *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL 07-1827 (N.D. Cal. Oct. 19, 2012), *objections denied* (D.E. 7152) (N.D. Cal. Nov. 14, 2012).

Subject to and without waiving his general and specific objections and consistent with Special Master Quinn’s order in the *TFT-LCD* litigation, Mr. St. John states that no documents related to any objection filed by him in any other case were located after a reasonable search.

Request No. 6

All DOCUMENTS RELATING TO any settlement made IN RELATION TO any OBJECTION (or subsequent appeal) filed in the last five (5) years by YOU and/or YOUR attorney currently REPRESENTING YOU in the CRT ANTITRUST LITIGATION.

Response and Specific Objections to Request No. 6

Mr. St. John objects to the request for “all” documents as over broad and unduly burdensome, particularly given Mr. St. John’s status as an absent class member. Mr. St. John objects to this request as seeking information that is not relevant and is outside the scope of permissible discovery. Mr. St. John objects to this request to the extent it seeks privileged information. Mr. St. John objects to this request as facially seeking documents that are not in his possession, custody, or control. Mr. St. John objects to this request as untailored, over broad, unduly burdensome, harassing, oppressive, and abusive in view of his sworn declaration that he has “never before submitted an objection.” Declaration of Douglas W. St. John (D.E. 4107) at ¶ 26.

Mr. St. John notes that Special Master Quinn limited a substantially identical request to “documents pertaining to objections filed in other cases by the Objector, not documents pertaining to objections filed in other cases by counsel for the Objector” in the *TFT-LCD* litigation. *See* Special Master’s Amended Order (D.E. 7011), *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL 07-1827 (N.D. Cal. Oct. 19, 2012), *objections denied* (D.E. 7152) (N.D. Cal. Nov. 14, 2012).

Subject to and without waiving his general and specific objections and consistent with Special Master Quinn’s order in the *TFT-LCD* litigation, Mr. St. John states that no documents relating to any settlement made in relation to any objection (or subsequent appeal) by him in any other case were located after a reasonable search.

Request No. 7

All DOCUMENTS RELATING TO the amount of any monetary compensation discussed, promised, or received by YOU from YOUR attorney currently REPRESENTING YOU in the CRT ANTITRUST LITIGATION in connection with any OBJECTION filed by YOU in any class action in the last ten (10) years.

Response and Specific Objections to Request No. 7

Mr. St. John objects to the request for “all” documents as over broad and unduly burdensome, particularly given Mr. St. John’s status as an absent class member. Mr. St. John objects to this request as seeking information that is not relevant and is outside the scope of permissible discovery. Mr. St. John objects to this request to the extent it seeks privileged information. Mr. St. John objects to this request as facially seeking documents that are not in his possession, custody, or control. Mr. St. John objects to this request as untailored, over broad, unduly burdensome, harassing, oppressive, and abusive in view of his sworn declaration that he has “never before submitted an objection.” Declaration of Douglas W. St. John (D.E. 4107) at ¶ 26.

Mr. St. John notes that Special Master Quinn limited a substantially identical request to “documents pertaining to objections filed in other cases by the Objector, not documents pertaining to objections filed in other cases by counsel for the Objector” in the *TFT-LCD* litigation. *See* Special Master’s Amended Order (D.E. 7011), *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL 07-1827 (N.D. Cal. Oct. 19, 2012), *objections denied* (D.E. 7152) (N.D. Cal. Nov. 14, 2012).

Subject to and without waiving his general and specific objections and consistent with Special Master Quinn’s order in the *TFT-LCD* litigation, Mr. St. John states that no documents relating to any settlement made in relation to any objection (or subsequent appeal) by him in any other case were located after a reasonable search.

Request No. 8

All DOCUMENTS RELATING TO changes made to any settlements as a result of any OBJECTION made within the last five (5) years by YOU and/or YOUR attorney currently REPRESENTING YOU in the CRT ANTITRUST LITIGATION.

Response and Specific Objections to Request No. 8

Mr. St. John objects to the request for “all” documents as over broad and unduly burdensome, particularly given Mr. St. John’s status as an absent class member. Mr. St. John objects

1 to this request as seeking information that is not relevant and is outside the scope of permissible
 2 discovery. Mr. St. John objects to this request to the extent it seeks privileged documents or
 3 information. Mr. St. John objects to this request as facially seeking documents that are not in his
 4 possession, custody, or control. Mr. St. John objects to this request as untailored, over broad,
 5 unduly burdensome, harassing, oppressive, and abusive in view of his sworn declaration that he has
 6 “never before submitted an objection.” Declaration of Douglas W. St. John (D.E. 4107) at ¶ 26.

7 Mr. St. John notes that Special Master Quinn limited a substantially identical request to
 8 “documents pertaining to objections filed in other cases by the Objector, not documents pertaining
 9 to objections filed in other cases by counsel for the Objector” in the *TFT-LCD* litigation. *See*
 10 Special Master’s Amended Order (D.E. 7011), *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL
 11 07-1827 (N.D. Cal. Oct. 19, 2012), *objections denied* (D.E. 7152) (N.D. Cal. Nov. 14, 2012).

12 Subject to and without waiving his general and specific objections and consistent with
 13 Special Master Quinn’s order in the *TFT-LCD* litigation, Mr. St. John states that no documents
 14 relating to changes made to any settlements as a result of any objection made within the last five (5)
 15 years by him were located after a reasonable search.

16
 17 Dated: October 29, 2015

By: /s/ Joseph Scott St. John

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